

## Impact Assessment

### SECTION A: GENERAL INFORMATION

Question	SSSC approach
<b>A1. Name of piece of work</b>	<b>Review of SSSC's Records Management Policy</b>
<b>A2. Brief description of work, including purpose and summary of aims.</b>	<p>The Public Records (Scotland) Act 2011 requires Scottish public authorities to produce and submit a records management plan setting out proper arrangements for the management of public records for the Keeper of Records for Scotland to agree. The Keeper agreed the SSSC's records management plan in 2014.</p> <p>Element 3 of a records management plan requires that an authority has an appropriate policy statement on records management. The policy statement should have senior management approval, include a statement of the named posts that hold corporate and operational responsibility for records management, and be regularly reviewed.</p> <p>The Policy aims to fulfil the requirement for good management of the records which the SSSC creates and receives in the course of administering its business.</p> <p>The Impact Assessment is intended to assess the review of the Policy.</p> <p>This work is linked to all strategic themes set out in the Strategic Plan 2023-2026:</p> <p>Outcome 1: <b>Trusted</b> People who use services are protected by a workforce that is fit to practise.</p> <p>Outcome 2: <b>Skilled</b> Our work supports the workforce to deliver high standards of professional practice.</p> <p>Outcome 3: <b>Confident</b> Our work enhances the confidence, competence and wellbeing of the workforce.</p>

	Outcome 4: <b>Valued</b> The social work, social care and children and young people workforce is valued for the difference it makes to people’s lives.
<b>A3. How does the work link to our <a href="#">Strategic Plan 2023-2026</a>? Choose one strategic theme. If helpful provide more information in A2.</b>	Choose an item. The Policy supports all the strategic themes.
<b>A4. Responsible department for this work</b>	Legal and Corporate Governance
<b>A5. Date of last Assessment or policy review (if relevant)</b>	26 August 2021.
<b>A6. Have you completed a Data Protection Impact Assessment? If yes please list the title and sign-off date.</b>	No

SECTION B: EQUALITY IMPACT ASSESSMENT (EQIA)

Please see guidance notes before completing the second column in this section, particularly Part 2 and Section B of the Appendix.

Question	SSSC approach
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<p><b>B1. Understanding impact: How is this piece of work relevant to equality groups?</b></p> <p><b>Use this section to briefly set out the context. Have you considered where there might be an impact?</b></p>	<p>The Policy aims to fulfil the requirement for good management of the records which the SSSC creates and receives in the course of administering its business. The Policy impacts on all SSSC staff and has the potential to impact on all protected characteristics/equality groups protected under the Equality Act 2010. The Policy is not about specifying what records should be created, rather about how the records which exist should be managed.</p> <p>The Policy covers all records that we create and receive, and therefore includes equality information about staff, job applicants, registered workers, register applicants, and any other information held which relate to protected characteristics. The Policy makes sure that these records are protected and kept in a secure manner and held no longer than their retention period. The Policy also supports the Data Protection Policy and makes sure that records are securely maintained to prevent unauthorised access, alteration, damage or removal. It therefore helps to mitigate risk of sensitive information, which individuals would not want to be shared being disclosed in error.</p> <p>As this is an internal governance policy, we think it will have a very limited impact on those with protected characteristics.</p>
<p><b>B2. Reviewing evidence and finding gaps</b></p> <p>What internal or external evidence on equality groups did you use to support your understanding (step 1) and assessment (step 3). Did you find gaps in the data?</p> <p>Examples could include data on SSSC employees: <a href="#">Mainstreaming Report, Data Annex, 2023</a> or the social work, social care and children and young people workforce: <a href="#">workforce data website</a>.</p>	<p>The Policy was developed by the Legal and Corporate Governance Team, who benchmarked the Policy against other organisations, and consulted internally with the Operational Management Team and the Executive Management Team. The policy was also assessed by the Keeper of Records of Scotland’s assessment team in 2021, who accepted it as fit for purpose.</p> <p>We have not reviewed any evidence on equalities specifically.</p>

<p>Population data is available from the Scottish Government's <a href="#">Equality Evidence Finder</a> and <a href="#">National Records of Scotland</a> website.</p>	
<p><b>B3: Assessing impact and taking action</b></p> <p><b>Will your piece of work have a negative, neutral or positive equality impact? Explain why. List any actions and summarise in Section H.</b></p>	<p>The Policy is expected to have a positive equality impact. Better management of records will lead to more effective information retrieval, be managed in a confidential and secure manner, and held for no longer than they are required.</p> <p>The Policy will also have an indirect impact on our stakeholders. Individuals who are registered with us or who are applying to register with us, have records generated about them, and therefore will benefit from improved records management practices, including improved retention and disposal practices. Many of the records that we hold through this process can be highly sensitive and may relate to protected characteristics ie disability, gender reassignment. This means that all groups would benefit to some measure.</p> <p>We do not feel that this Policy is going to significantly contribute to equality need 2 or equality need 3 because the Policy exists to make sure that information held by the SSSC is managed in a secure manner. We feel that this aim is more likely to address equality need 1, so our individual assessments will focus on that need.</p>

Protected Characteristics	Equality Need	Our approach	Positive, negative or neutral impact

Age	1. Will your proposed piece of work eliminate discrimination, harassment and victimisation and other conduct?	<p>We expect the Policy to have a positive impact in relation to age. We hold core employee data and equality information that will contain information on the age of our staff. These are sensitive records that could cause distress to individuals if they were inadvertently disclosed by us. The Policy makes sure any risk of this is mitigated and therefore should have a positive impact on both older and younger individuals.</p> <p>This example focussed on staff, but records held which relate to our stakeholders ie registration records on workers, which will contain their date of birth, will be dealt with in the same way.</p>	Positive
Disability	1. Will your proposed piece of work eliminate discrimination, harassment and victimisation and other conduct?	<p>We expect the Policy to have a positive impact in relation to disability. We hold health and equality information that will contain information on staff disabilities. This is sensitive information that could cause distress to individuals if it were inadvertently disclosed by us. The Policy makes sure any risk of this is mitigated and therefore should have a positive impact on staff.</p>	Positive

		<p>This example focussed on staff, but records held which relate to our stakeholders ie registration or fitness to practise records which contain disability information about workers, will be dealt with in the same way.</p>	
Gender reassignment	<p>1. Will your proposed piece of work eliminate discrimination, harassment and victimisation and other conduct?</p>	<p>We expect the Policy to have a positive impact in relation to gender reassignment. We hold core staff records and equality information that may contain information on staff gender reassignment. This is sensitive information that could cause distress to individuals if it were inadvertently disclosed. The Policy makes sure any risk of this is mitigated and therefore should have a positive impact on staff.</p> <p>This example focussed on staff, but records held which relate to our stakeholders ie registration or fitness to practise records which contain gender reassignment information about workers, will be dealt with in the same way.</p>	Positive

<p>Marriage and civil partnership</p>	<p>1. Will your proposed piece of work eliminate discrimination, harassment and victimisation and other conduct?</p>	<p>We expect the Policy to have a positive impact in relation to marriage and civil partnership. We hold core staff records and equality information that may contain information on marriage and civil partnership. This is sensitive information that could cause distress to individuals if it were inadvertently disclosed. The Policy makes sure any risk of this is mitigated and therefore should have a positive impact on staff.</p> <p>This example focussed on staff, but records held which relate to our stakeholders ie fitness to practise records which contain marriage or civil partnership information about workers, will be dealt with in the same way.</p>	<p>Positive</p>
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Pregnancy and Maternity	1. Will your proposed piece of work eliminate discrimination, harassment and victimisation and other conduct?	<p>We expect the Policy to have a positive impact in relation to pregnancy and maternity. We hold human resource records, health and safety records and supervision records that may contain information on pregnancy and maternity. This is sensitive information that could cause distress to individuals if it were inadvertently disclosed. The Policy makes sure any risk of this is mitigated and therefore should have a positive impact on staff.</p> <p>This example focussed on staff, but records held which relate to our stakeholders ie fitness to practise records which contain pregnancy or maternity information on workers, will be dealt with in the same way.</p>	Positive
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Race	1. Will your proposed piece of work eliminate discrimination, harassment and victimisation and other conduct?	<p>We expect the Policy to have a positive impact in relation to race. We hold core staff records and equality information that may contain information on race. This is sensitive information that could cause distress to individuals if it were inadvertently disclosed. The Policy makes sure any risk of this is mitigated and therefore should have a positive impact on staff.</p> <p>This example focussed on staff, but records held which relate to our stakeholders ie fitness to practise records which contain race information about workers, will be dealt with in the same way.</p>	Positive
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<p>Religion or belief</p>	<p>1. Will your proposed piece of work eliminate discrimination, harassment and victimisation and other conduct?</p>	<p>We expect the Policy to have a positive impact in relation to religion or belief. We hold staff equality information that may contain information on religion or belief. This is sensitive information that could cause distress to individuals if it were inadvertently disclosed. The Policy makes sure any risk of this is mitigated and therefore should have a positive impact on staff.</p> <p>This example focussed on staff, but records held which relate to our stakeholders ie fitness to practise records which contain information on religion or belief of workers, will be dealt with in the same way.</p>	<p>Positive</p>
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Sex	1. Will your proposed piece of work eliminate discrimination, harassment and victimisation and other conduct?	<p>We expect the Policy to have a positive impact in relation to sex. We hold equality information that may contain information on sex. This is sensitive information that could cause distress to individuals if it were inadvertently disclosed. The Policy makes sure any risk of this is mitigated and therefore should have a positive impact on staff.</p> <p>This example focussed on staff, but records held which relate to our stakeholders ie fitness to practise records which contain sex information about workers, will be dealt with in the same way.</p>	Positive
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Sexual orientation	1. Will your proposed piece of work eliminate discrimination, harassment and victimisation and other conduct?	<p>We expect the Policy to have a positive impact in relation to sexual orientation. We hold equality information that may contain information on sexual orientation. This is sensitive information that could cause distress to individuals if it were inadvertently disclosed. The Policy makes sure any risk of this is mitigated and therefore should have a positive impact on staff.</p> <p>This example focussed on staff, but records held which relate to our stakeholders ie fitness to practise records which contain sexual orientation information about workers, will be dealt with in the same way.</p>	Positive
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## SECTION C: CHILDREN'S RIGHTS AND CARE EXPERIENCE ASSESSMENT

Please see guidance notes before completing the second column in this section, particularly Part 2 and Section C of the Appendix.

Question	SSSC approach
<p><b>C1. Understanding impact: How is this piece of work relevant to children's rights and care experienced children and young people?</b></p> <p>Use this section to briefly set out the context. Have you considered where there might be an impact?</p>	<p>The Policy is expected to have no direct impact in this area as it applies to adults only. However, it may have an indirect impact because the Public Records (Scotland) Act 2011 fulfils one of the main recommendations of the 2007 Historical Abuse Systemic Review (the Shaw Report). The Shaw Report found that poor record keeping often created difficulties for former residents of residential schools and children's homes, when they attempted to trace their records. Therefore, good records management may have an indirect positive impact on this area because our fitness to practise investigation records may contain information relating to children and young people.</p> <p>The Historical Child Abuse Inquiry Scotland also set out in October 2015, that public authorities must have regard to the Inquiry, and consider the protection of potentially relevant records, to make sure they are not destroyed before the Inquiry has had the opportunity to review them. The Policy supports our retention schedule which sets out that investigation records, which could potentially include information relating to children and young people, are to be retained until the conclusion of this Inquiry.</p>
<p><b>C2. Reviewing evidence and finding gaps</b></p> <p>What internal or external evidence on children's rights or care experience did you use to support your understanding (step 1) and assessment (step 3). Did you find gaps in the data?</p>	<p>We have benchmarked against other organisations and consulted internally with the Operational Management Team and the Executive Management Team. The policy was also assessed by the Keeper of Records of Scotland's assessment team in 2021, who accepted it as fit for purpose.</p>

<p>Examples: <a href="#">Children’s social work statistics</a> available from Scottish Government website. <a href="#">The Promise Scotland</a> and the <a href="#">Children and Young People’s Commissioner Scotland</a> have several resources on care experience and children’s rights.</p>	
<p><b>C3: Assessing impact and taking action</b></p> <p>Will your piece of work have a negative, neutral or positive impact on children’s rights or care experience? Explain why. List any actions and summarise in Section H.</p>	<p>We expect this Policy to have a positive impact.</p>

#### SECTION D: TRAUMA INFORMED ASESMENT

Please see guidance notes before completing the second column in this section, particularly Part 2 and Section D of the Appendix.

<b>Question</b>	<b>SSSC approach</b>
<p><b>D1. Understanding impact: How is this piece of work relevant to trauma informed practice?</b></p> <p><b>Use this section to briefly set out the context. Have you considered where there might be an impact?</b></p>	<p>The Policy is not expected to have a direct impact in this area. However, it may have an indirect positive impact due to the reasons described in C1.</p>
<p><b>D2. Reviewing evidence and finding gaps</b></p> <p>What internal or external evidence on trauma informed practice did you use to support your</p>	<p>As described in C1.</p>

<p>understanding (step 1) and assessment (step 3). Did you find gaps in the data?</p>	
<p><b>D3: Assessing impact and taking action</b></p> <p><b>Will your piece of work have a negative, neutral or positive impact on our work to promote trauma informed practice? Explain why. List any actions and summarise in Section H.</b></p>	<p>The Policy is expected to have an indirect positive impact as described in C1.</p>

SECTION E: ISLANDS, FAIRER SCOTLAND AND VULNERABLE PEOPLE ASSESSMENT

Please see guidance notes before completing the second column in this section, particularly Part 2 and Section E of the Appendix.

<b>Question</b>	<b>SSSC approach</b>
<p><b>E1. Understanding impact: How is this piece of work relevant to the Scottish Islands, promoting a Fairer Scotland or supporting vulnerable people?</b></p> <p>Use this section to briefly set out the context. Have you considered where there might be an impact?</p>	<p>The Policy is not expected to have a direct impact in this area. However, it may have an indirect positive impact due to the reasons described in B3.</p>
<p><b>E2. Reviewing evidence and finding gaps</b></p> <p>What internal or external evidence on the Islands, Fairer Scotland or vulnerable people did you use to</p>	<p>As described in B3.</p>

<p>support your understanding (step 1) and assessment (step 3). Did you find gaps in the data?</p> <p>Examples: Scottish Government <a href="#">publishes data on composition of island population</a>. We publish <a href="#">workforce data</a> on proportion of staff in island local authority areas. The Government also publishes data on poverty and carers: <a href="#">Poverty and Income inequality statistics</a> and <a href="#">Carers Census</a>.</p>	
<p><b>E3: Assessing impact and taking action</b></p> <p>Identify any actions here, including timescales, lead responsibility and how you'll monitor success.</p>	<p>The Policy is expected to have an indirect positive impact as described in B3.</p>

## SECTION F: EMPLOYER ASSESSMENT

Please see guidance notes before completing the second column in this section, particularly Part 2 and Section F of the Appendix.

<b>Question</b>	<b>SSSC approach</b>
<p><b>F1. Understanding impact: How is this piece of work relevant to employers?</b></p> <p>Use this section to briefly set out the context. Have you considered where there might be an impact?</p>	The Policy is expected to have no impact in this area.
<p><b>F2. Reviewing evidence and finding gaps</b></p> <p>What internal or external evidence on employers did you use to support your understanding (step 1) and assessment (step 3). Did you find gaps in the data?</p> <p>Examples: Our <a href="#">data website</a> has information on employers and active services registered with the Care Inspectorate. For example, have you consulted employers on your proposals? Have you identified any challenges or options?</p>	
<p><b>F3: Assessing impact and taking action</b></p> <p>Identify any actions here, including timescales, lead responsibility and how you'll monitor success.</p>	

SECTION G: SUSTAINABILITY ASSESSMENT

Please see guidance notes before completing the second column in this section, particularly Part 2 and Section G of the Appendix.

Question	SSSC approach
<p><b>G1. Understanding impact: How is this piece of work relevant to sustainability?</b></p> <p>Use this section to briefly set out the context. Have you considered where there might be an impact?</p>	<p>The Policy supports the development of low cost storage. We are carrying out a project to reduce the use of offsite storage of paper records and storing these records in a digital format instead. We expect that this project and movement towards a digital environment will have a positive impact on the environment by reducing paper production.</p>
<p><b>G2. Reviewing evidence and finding gaps</b></p> <p>What internal or external evidence on sustainability did you use to support your understanding (step 1) and assessment (step 3). Did you find gaps in the data?</p>	
<p><b>G3: Assessing impact and taking action</b></p> <p>Identify any actions here, including timescales, lead responsibility and how you'll monitor success.</p>	

H. FINAL REVIEW AND SIGN-OFF

SSSC approach	SSSC approach
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<p><b>H1. Summary of Assessment</b></p> <p>a. Summary of any actions or changes found during assessment</p> <p>b. How will we monitor this piece of work and any further impacts?</p>	<p>The Policy is monitored on an ongoing basis and will be updated as and when required. We adopt a three yearly review schedule, at which point it will be fully reassessed.</p>
<p><b>H2. Owner (Head of Department):</b></p> <p><b>Date approved by Head of Department:</b></p>	<p>Head of Legal and Corporate Governance</p> <p>11 July 2024</p>

NEXT STEPS

Send completed IA to [Policy and Equality Team](#). Please let know the Team know when the IA should be published on our website or if there is any reason why we should not publish the IA.

Reports to Council, Committee, Executive Management Team and Programme Boards must include your IA. Please contact [Legal and Corporate Governance team](#) for further information.